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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

LANTERN LIGHT CORPORATION, d/b/a
ADVANCED INFORMATION SYSTEMS, a
corporation; DIRECTV LLC, a limited
liability company; and RAMON MARTINEZ,
an individual,

Defendants.

) Case No.: 2:12-cv-01406-RSM

)
)
) **DECLARATION OF WAGE AND HOUR**
) **TECHNICIAN MICHAEL HOFFMAN IN**
) **SUPPORT OF PLAINTIFF'S MOTION**
) **FOR PARTIAL SUMMARY JUDGMENT**
) **AGAINST DEFENDANT DIRECTV LLC**

1 Now comes Michael Hoffman, and states as follows:

- 2 1. I have been, at all relevant times herein, employed by the Wage and Hour Division of the
3 United States Department of Labor as Wage and Hour Technician in the Seattle,
4 Washington District office.
- 5 2. As set forth below, I have personal knowledge of the matters stated herein and, if
6 necessary, I could and would testify to the facts stated below.
- 7 3. As part of my duties on behalf of the Secretary of Labor for the United States Department
8 of Labor (the "Secretary"), I reviewed several years of time records provided to the
9 Secretary by Defendant Lantern Light Corporation, d/b/a Advanced Information Systems
10 ("AIS").
11
- 12 4. These time records were submitted each week to AIS by employee installers.
- 13 5. The time records provided to AIS by the Secretary covered 180 employee installers over
14 the period from approximately August 12, 2010, to December 12, 2013.
- 15 6. These time records show many employee installers working at AIS on an ongoing basis
16 for several years. For example:
 - 17 a. AIS provided time records showing employee Miguel Rocha worked at AIS from
18 December 9, 2010, to December 12, 2013.
 - 19 b. AIS provided time records showing employee Yair Servin worked at AIS from
20 August 19, 2010, to June 28, 2012, from October 11, 2012, to January 17, 2013,
21 and from May 2, 2013, to December 12, 2013. Servin missed isolated paychecks
22 from individual weeks in the above time periods.
 - 23 c. AIS provided time records showing employee Robert Meek worked at AIS from
24 December 9, 2010, to December 12, 2013.
25

- 1 d. AIS provided time records showing employee Mark Hanicker worked at AIS
2 from November 11, 2010, to December 12, 2013.
3 e. AIS provided time records showing employee Sean Lkhagvasuren worked at AIS
4 from September 2, 2010, to June 7, 2012.
5 f. AIS provided time records showing employee Miroslav Kondratyuk worked at
6 AIS from to October 18, 2012.
7

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
9 United States of America that the foregoing is true and correct.
10

11
12 Dated: 3/18/15



MICHAEL HOFFMAN